

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DIAMOND ASSETS LLC

Plaintiff,

v.

Case Number: 18-cv-568

E-TECH ASSET LLC,

Defendant.

MOTION FOR CONTEMPT ORDER

Plaintiff Diamond Assets, LLC (“Diamond”), by its undersigned attorneys and pursuant to Federal Rules of Civil Procedure 65 and 70(e), hereby moves the Court for an order finding Defendant E-Tech Asset LLC (“E-Tech”) in contempt for violating the stipulated preliminary injunction order entered in this case (Dkt. 22) (the “Order”). For at least the reasons stated in the accompanying memorandum of law, Plaintiff respectfully requests an order providing the following relief:

- A. An injunction requiring same-day compliance with the Order;
- B. Enhanced damages under 15 U.S.C. § 1117(a), not to exceed three times actual damages to be proven at trial, for the time period of the violation of the Order;
- C. Payment of Diamond’s reasonable attorneys’ fees incurred in preparing and arguing this motion; and,
- D. Any additional relief the Court deems just.

Date: October 5, 2018

Respectfully submitted,

By: s/Garet K. Galster
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